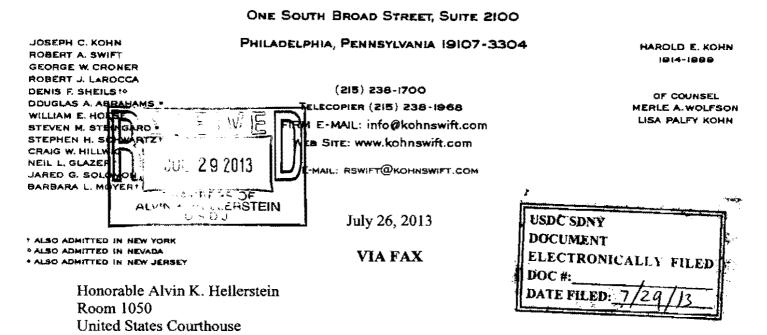
## KOHN, SWIFT & GRAF, P.C.



500 Pearl Street New York, NY 10007

Re: Aldo Vera v. The Republic of Cuba, No. 12 Civ. 1596

## Dear Judge Hellerstein:

I am one of the counsel for Plaintiff Vera in the above matter and am appearing pro hac vice. Following the hearing on June 25, counsel for the three judgment creditors engaged in discussion to consider working jointly in execution on their respective judgments. The three judgment creditors, Vera, Hausler and Villoldo, reached agreement today and will move forward cooperatively to file complaints against garnishee banks. The judgment creditors have agreed not to pursue the following motions inter se: ECF #'s 251 and 255. In addition, they have agreed to consolidation of newly filed execution proceedings going forward in the Vera action.

The judgment creditors intend to proceed cooperatively in three modes:

- Vera will submit either stipulated turnover orders or proposed turnover orders as to three garnishee banks which do not contest Vera's turnover motions. Hausler and Villoldo will covenant not to sue those three bank in connection with the turnover of the blocked accounts, effectively concluding the claims as to these three banks.
- 2. The judgment creditors will file a joint complaint as to two garnishee banks which do not contest turnover but do insist on notification to potential third parties. This will be denominated as a related case to the *Vera* action.
- 3. The judgment creditors will file a separate joint complaint as to all other garnishee banks, which number over 25. This also will be denominated as a related case to the *Vera* action.

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KOHN, SWIFT & GRAF, P.C.

CONTINUATION SHEET NO. 2

Hon, ALVIN K, HELLERSTEIN JULY 26, 2013

Because the judgment creditors only reached agreement today, counsel are unable to meet the Court's deadline of July 26 (today) to file a joint complaint. Accordingly, counsel request the Court's indulgence to extend the time to do the above until August 21, 2013, with the expectation that items 1 and 2 will be accomplished sooner.

To effectively notify all counsel of record of the above, this letter is being filed via ECF.

Respectfully yours,

Robert A. Swift

RAS:yr

Cc via ECF e-mail: All Counsel

So ordered: